

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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UNITED STATES OF AMERICA

NO. 3:13-CR-321-N DEPUTY CLERK

v.

ERIN PATTON (01)

FACTUAL RESUME

Erin Patton ("Patton"), the defendant, Doug Morris, the defendant's attorney, and the United States of America agree to the law and facts as follows:

ELEMENTS OF THE OFFENSE

In order to prove the offense alleged in Count One of the Superseding Information, that is, Conspiracy to Commit Sex Trafficking of Children in violation of 18 U.S.C. § 1594(c), the government must prove each of the following elements beyond a reasonable doubt:

- First:* That the defendant and another person knowingly entered into an agreement to recruit, entice, harbor, transport, provide, obtain or maintain by any means Jane Doe, who had not attained the age of 18 years, knowing or in reckless disregard of the fact she had not attained the age of 18 years, and who was caused to engage in commercial sex acts;
- Second:* That the defendant's acts and objects of the conspiracy were in and affecting interstate commerce;
- Third:* That the defendant knew of the unlawful purpose of the agreement; and

Fourth: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

STIPULATED FACTS

In September of 2012, fourteen year old Jane Doe met Erin Patton through a friend after Jane Doe ran away from home. Patton let Jane Doe stay with her, and Patton facilitated Jane Doe engaging in commercial sex acts by driving her to locations where commercial sex acts occurred and by providing Jane Doe with a cellular phone to post herself on "Mocospace" and Backpage.com. Jane Doe gave Patton a portion of the money she earned from engaging in the commercial sex acts.

In November of 2012, Jane Doe contacted Erin Patton again after running away from home. This time, Patton and her boyfriend Keith Williams (a/k/a "Chucky Blood") picked up Jane Doe together. They posted her on Backpage.com to advertise her availability to engage in commercial sex acts. Williams went to serve a jail sentence shortly thereafter. Patton, however, continued to facilitate Jane Doe's commercial sex acts. Patton listed her phone number as the one to call on Jane Doe's Backpage.com ads, and Patton again gave Jane Doe a cellular phone, which she used to connect with potential customers on the website "Mocospace." Jane Doe eventually left.

Then in late April of 2013, Jane Doe contacted Patton on Facebook messenger to arrange for Patton to pick her up. Jane Doe told Patton how she was in school, but she wanted to leave. Patton and Williams agreed to let Jane Doe stay with them, but they

told her she was going to need money to cover her own expenses so she was going to have to engage in commercial sex acts like she had in the past. Patton again gave Jane Doe a cellular phone to use to connect with customers on "Mocospace." Williams and/or Patton then drove Jane Doe to several locations in Dallas for her engage in commercial sex acts. Jane Doe gave all the money that she earned to Williams and Patton during this time period.

On May 4, 2013, DPD officers saw a 2004 Chevy Impala (which belonged to Patton) parked in an area known for prostitution. When officers approached the car, they encountered now fifteen year old Jane Doe in the car and began talking to her. Williams came by shortly thereafter. Officers learned that Jane Doe had been reported as a runaway. DPD interviewed Jane Doe, who admitted to engaging in commercial sex acts as well as the other information described above.

Officers advised Williams of his *Miranda* rights, which he waived and agreed to be interviewed. He admitted he recently learned that Jane Doe was fifteen, and he transported Jane Doe to engage in commercial sex acts even after he knew how old she was. Williams further admitted to collecting proceeds from her "dates." He also signed a written statement admitting these facts.

Accordingly, Patton admits that from on or about November of 2012 through on or about May 4, 2013, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, that she and Williams knowingly entered into an

agreement to recruit, entice, harbor, transport, provide, obtain or maintain by any means Jane Doe, who was under the age of 18, knowing or in reckless disregard of the fact that she had not attained the age of 18, and who was caused to engage in commercial sex acts; and her acts were in or affecting interstate commerce. Patton further acknowledges that she knew of the unlawful purpose of the agreement, and she joined in the agreement willfully, that is, with the intent to further its unlawful purpose. Finally, Patton admits that her conduct violated 18 U.S.C. § 1594(c), and the above facts are true and correct.

Cara Foos Pierce
CARA FOOS PIERCE
Assistant United States Attorney

Erin Patton
ERIN PATTON
Defendant

D. Morris
DOUG MORRIS
Attorney for Defendant

4-10-14
Date

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Date